

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	Criminal Action No. 17-40010-TSH
KEVIN A. PERRY, JR.	)	
Defendant.	)	

**UNITED STATES' SECOND BILL OF PARTICULARS FOR  
FORFEITURE OF ASSETS**

The United States of America, by and through its attorney, William D. Weinreb, Acting United States Attorney for the District of Massachusetts, hereby files the following Bill of Particulars for Forfeiture of Assets.

On March 16, 2017, a federal grand jury sitting in the District of Massachusetts returned a fourteen-count Indictment, charging defendant Kevin A. Perry, Jr. (the “Defendant”), with Money Laundering, in violation of 18 U.S.C. § 1956(a)(1)(B)(i) (Counts One through Nine), Unlawful Cash Structuring, in violation of 31 U.S.C. § 5324(a) (Counts Ten through Twelve), False Statement on a Loan Application, in violation of 18 U.S.C. § 1014 (Count Thirteen), and Distribution of Fentanyl, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(2)(A)(iv) (Count Fourteen). The Money Laundering Forfeiture Allegation in the Indictment gave the Defendant notice that, pursuant to 18 U.S.C. § 982(a)(1), the United States intended to seek forfeiture of any property, real or personal, involved in Counts One through Nine of the Indictment, and any property traceable to such offenses.

On March 21, 2017, the United States filed a Bill of Particulars for Forfeiture of Assets (the “First Bill of Particulars”), without limiting in any manner the Money Laundering Forfeiture Allegation, giving notice that the United States intended to seek the forfeiture of various real properties. *See* Docket No. 15.

Pursuant to, and without limiting in any manner the Money Laundering Forfeiture Allegation and/or the First Bill of Particulars, the United States hereby gives notice that it intends to seek the forfeiture of, without limitation, the following specific properties:

- i. all contents and all assets, including, but not limited to, furniture, equipment, inventory, leases, accounts receivable and notes receivable of The Usual Corporation d/b/a The Chameleon, 166 Shrewsbury Street, Worcester, Massachusetts; and
- ii. all contents and all assets, including, but not limited to, furniture, equipment, inventory, leases, accounts receivable and notes receivable of The Blackstone Tap Corporation d/b/a The Blackstone Tap, 81 Water Street, Worcester, Massachusetts.

Respectfully submitted,

WILLIAM D. WEINREB  
Acting United States Attorney,

By: /s/ Doreen M. Rachal  
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Dated: October 12, 2017

**CERTIFICATE OF SERVICE**

I hereby certify that the United States' Second Bill of Particulars for Forfeiture of Assets, filed through the Electronic Case Filing system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Doreen M. Rachal  
DOREEN M. RACHAL  
Assistant United States Attorney

Dated: October 12, 2017